

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

HEALTHIER CHOICES  
MANAGEMENT CORP.,

Plaintiff,

v.

PHILIP MORRIS USA, INC. and PHILIP  
MORRIS PRODUCTS S.A.,

Defendants.

Case No. 1:20-cv-04816-TCB

**DEFENDANT PHILIP MORRIS USA, INC.’S UNOPPOSED  
MOTION FOR EXTENSION OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendant Philip Morris USA, Inc. (“PMUSA”) respectfully submits this Unopposed Motion For Extension of Time with which PMUSA must answer, move, or otherwise respond to Plaintiff Healthier Choices Management Corp.’s (“Healthier Choices”) Complaint by February 26, 2021. Healthier Choices does not oppose the requested extension.

Healthier Choices filed this lawsuit on November 30, 2020, and served its Complaint on December 4, 2020. PMUSA has already received one extension of

time to respond to the Complaint. The current deadline for PMUSA to answer or otherwise respond is January 27, 2021.

Defendant Philip Morris Products S.A.'s response is currently due on February 26, 2021. PMUSA respectfully requests the deadline to respond to the Complaint be extended to February 26, 2021 so that both Defendants may respond to the Complaint on the same day.

Dated: January 19, 2021

Respectfully Submitted,

/s/ Charles A. Pannell, III

Charles A. Pannell, III

Georgia Bar No. 141535

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*Counsel for Defendant Philip  
Morris USA, Inc.*

**7.1(D) CERTIFICATION**

Counsel for the Defendant hereby certifies that this document has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C).

/s/ Charles A. Pannell, III

Charles A. Pannell, III

**CERTIFICATE OF SERVICE**

I hereby certify that on January 19, 2021, a copy of the foregoing was filed and served using CM/ECF which will send electronic notification of such filing to all counsel of record.

/s/ Charles A. Pannell, III  
Charles A. Pannell, III  
*Attorney for Defendant*